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**Pro hac vice applications to be submitted*

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DALLIN MONTGOMERY; NICK HOLDWAY; KEVIN WALTERS; OREGON FIREARMS FEDERATION; and FIREARMS POLICY COALITION, INC.,

Plaintiffs,

v.

ELLEN ROSENBLUM, in her Official Capacity as Oregon Attorney General; and CASEY CODDING, in his Official Capacity as Superintendent of the Oregon State Police,

Defendants.

Case No.: 3:24-cv-01273-AN

DECLARATION OF KEVIN WALTERS IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER AND/OR PRELIMINARY INJUNCTION

EXPEDITED HEARING AND ORAL ARGUMENT REQUESTED

RELIEF REQUESTED BEFORE SEPTEMBER 1, 2024

I, Kevin Walters, declare:

1. I am over 18 years old. I am competent to give this declaration. I have personal knowledge of the matters set forth in this declaration and would be able to testify to them if called as a witness.

2. I am a citizen of the United States and a resident of the State of Oregon, currently residing in Lane County, Oregon.

3. I am a member of Firearms Policy Coalition, Inc. and Oregon Firearms Federation.

4. I hold an Oregon concealed carry permit issued by the Lane County Sheriff's Office.

5. I am not a federally or state licensed firearms manufacturer, importer, or dealer.

6. I am aware of Oregon House Bill 2005's prohibitions on items it defines as an "unfinished frame or receiver" and "undetectable firearm," and I am aware of its general prohibitions on unserialized firearms. I am also aware that HB 2005 will take effect on September 1, 2024.

7. I possess multiple items that I believe fall within HB 2005's definition of "unfinished frame or receiver" or its definition of "undetectable firearm." Specifically, I used a 3D printer to manufacture frames for three Glock-style semiautomatic pistols using PLA+ filament. After I learned that HB 2005 was pending, I abandoned my efforts to complete the process to build a complete functioning firearm. I desire to continue to own and possess these items to further my right of self-defense and for other lawful purposes, and not to sell or otherwise dispose of them. As I understand HB 2005, it does not permit me to retain possession of an "undetectable firearm" even if it were serialized. Even if it did, I do not want to incur the cost to serialize these items and prefer not to do so because serialization is permanent and cannot be undone should I prevail in this lawsuit. Furthermore, because HB 2005 criminalizes the mere possession of an unserialized "unfinished frame or receiver," I see no clear legal path as to how I could comply with the law through serialization. In short, I must either surrender or destroy the items.

8. But for HB 2005 and its threat of criminal sanction (including fines and/or

imprisonment that could lead to the loss of my Second Amendment protected rights), I would finish building these firearms and would use a 3D printer to manufacture additional firearms out of PLA+.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed August 7, 2024.

Signed by:

kevin Walters
CT39FB53084A467...
Kevin Walters